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R.R. 1, Box 216
Purdy, Missouri 65734
ikeh@hotmail.com

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HHS-SAMHSA
wwogl@samhsa.gov

Subject: Comment upon HHS-SAMHSA, FR Doc 04-7985, SVT Revised Mandatory Guidelines pertaining to presence of halogen, 69FR 19644-19673.

Dear Secretary:

The revised mandatory guidelines (effective date 10/1/2004) for specimen validity testing (SVT) reporting procedures, Section 2.4.h.iv addresses adulterated human urine specimens due to the presence of halogen. I wish to comment that the word "halogen" should be substituted with "oxidative halogen". Halogen is the term used for all of the elements in Group VII of the Periodic Table (Fluorine, Chlorine Bromine, Iodine, Astatine). The term halogen is not specific to the oxidative ability of the element(s). Chloride ion (Cl⁻) is not an oxidant. Chlorous ion (ClO⁻), the active component of commercial "bleach", is an oxidant. Chlorine gas (Cl₂) is an oxidant. Thus the term halogen alone only refers to the group of elements. For clarity, the term oxidative halogen should be used when in reference to a halogen that is acting as an oxidant.

Respectfully yours,

W.D. Hemphill, Ph.D., DABFT